

Kramer Levin

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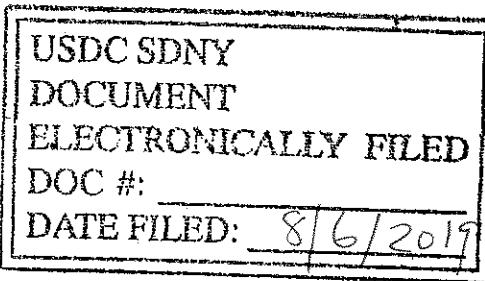
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July 26, 2019

Via ECF & Hand Delivery

The Honorable Denise Cote
United States District Court
Southern District of New York
500 Pearl Street, Room 1910
New York, NY 10007



Re: **Novartis Vaccines and Diagnostics, Inc. et al. ("Novartis") v. Regeneron Pharmaceuticals, Inc. ("Regeneron"), No. 18-cv-2434 (DLC) (S.D.N.Y.)**

Dear Judge Cote:

Pursuant to the Court's Individual Practice Rule 4.A, Regeneron respectfully requests that Exhibits 1 and 2 to the Declaration of Irena Royzman in support of Regeneron's Responsive Markman Brief Regarding Additional Claim Terms be filed under seal. The documents contain highly proprietary information, as set forth below.

- Exhibit 1, the Expert Report of Kathryn Calame, Ph.D., because it discusses in detail highly sensitive commercial and proprietary information concerning Regeneron's product that is not otherwise publicly available, and is designated as "Highly Confidential" pursuant to the Protective Order in this litigation (see Dkt. 064).
- Exhibit 2, the Rebuttal Report of Kathryn Calame, Ph.D., because it discusses in detail highly sensitive commercial and proprietary information concerning Regeneron's product that is not otherwise publicly available, and is designated as "Highly Confidential" pursuant to the Protective Order in this litigation (see Dkt. 064).

Sincerely,

/s/ Irena Royzman

*Granted.
Denise Cote
8/6/19*

MEMO ENDORSED